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6
7 **UNITED STATES DISTRICT COURT**
8 **SOUTHERN DISTRICT OF CALIFORNIA**
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11 UNITED STATES OF AMERICA,) CRIMINAL CASE NO.: 07CR3245-BEN
12)
13 Plaintiffs,) **JOINT MOTION TO CONTINUE**
14 v.) **MOTION HEARING FROM MAY 16,**
15 EZEQUIEL LOPEZ and ARMANDO) **2008 TO JUNE 23, 2008**
16 REGALADO-NARANJO)
17 Defendant.)
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29 NOTICE IS HEREBY GIVEN THAT: Defendant EZEQUEIL LOPEZ (hereinafter
30 “LOPEZ”) by and through his attorney of record Francisco J. Sanchez, Jr. and Defendant,
31 ARMANDO REGALADO-NARANJO (hereinafter “REGALADO-NARANJO”), by and
32 through his attorney of record, Manuel L. Ramirez, Esq. of The Ramirez Law Firm; and
33 Plaintiff, United States of America, by and through Assistant United States Attorney Jill
34 Burkhardt, jointly move this Honorable Court to continue the current motion date of May 16,
35 2008 to June 23, 2008. The grounds for the instant joint motion are as following:

- 36 1. All parties herein mentioned need additional time to review and analyze new
37 discovery that has recently been produced;
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- 1 2. REGALADO-NARANJO, LOPEZ and the Government also need additional time to
2 meet, discuss and negotiate a possible disposition of this matter in light of the newly
3 produced discovery;
4 3. The Government and both Defendants believe that it will be in the best interest of
5 judicial and law enforcement economy to continue the motion hearing to the date
6 requested.

7 **CONCLUSION**

8 Based on the above, it is respectfully requested that the instant Joint Motion to Continue
9 the Motion Hearing date be granted.

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11 Dated: May 16, 2008

THE RAMIREZ LAW FIRM

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13 By: /s/ MANUEL L. RAMIREZ
14 Manuel L. Ramirez, Esq.
15 Attorneys for Defendant,
16 ARMANDO REGALADO-NARANJO

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18 FRANCISCO J. SANCHEZ, JR.

19 /s/ FRANCISCO J. SANCHEZ, JR.
20 Francisco J. Sanchez, Jr. Esq.
21 Attorney for Defendant
22 EZQUIEL LOPEZ

23
24 Dated: May 16, 2008

UNITED STATES ATTORNEY
KAREN P. HEWITT

25
26 By: /s/ JILL BURKHARDT
27 Jill Burkhardt, Esq.
28 Assistant U.S. Attorney,